

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SERGIO BONILLA, on behalf of himself and
all others similarly situated,

Plaintiff,

v.

ANCESTRY.COM OPERATIONS INC., a
Virginia Corporation; ANCESTRY.COM INC.,
a Delaware Corporation; ANCESTRY.COM
LLC, a Delaware Limited Liability Company;
and DOES 1 through 50, inclusive,

Defendants.

CASE NO. 1:20-cv-07390

Hon. Virginia M. Kendall

**JOINT MOTION FOR ENTRY OF AGREED CONFIDENTIALITY ORDER AND
ORDER GOVERNING THE DISCOVERY OF ELECTRONICALLY STORED
INFORMATION**

Defendants Ancestry.com Operations Inc., Ancestry.com Inc., and Ancestry.com LLC (collectively, “Ancestry”) and plaintiff Sergio Bonilla (together, the “Parties”), hereby jointly move this honorable Court to enter the proposed protective order and the proposed order governing the discovery of electronically stored information.¹ In support of their motion, the Parties state as follows:

1. Pursuant to Rule 26(c)(1) of the Federal Rules of Civil Procedure, good cause exists for the entry of the proposed protective order, which is based on the Form LR 26.2 Model Confidentiality Order, to ensure that disclosure of confidential information produced by parties and non-parties in this proceeding is appropriately protected.

¹ Word versions of the proposed orders and a redline showing the modifications to the Form LR 26.2 Model Confidentiality Order have been submitted via e-mail to the Court’s Proposed Order mailbox.

2. As the redline shows, the main modification to the Model Confidentiality Order was the creation of a highly confidential category, which provides protection for highly confidential information, such as trade secrets and other highly sensitive information.

3. The Parties also hereby move the Court to enter the agreed stipulation and proposed order governing the discovery of electronically stored information, which the Parties agreed sets forth the specifications that shall govern document production during discovery in the above-captioned action.

Accordingly, the Parties respectfully request that the Court enter the proposed protective order and the proposed order governing the discovery of electronically stored information.

Respectfully submitted.

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

By: /s/ Shon Morgan
Shon Morgan

Dated: March 2, 2022

Shon Morgan (*pro hac vice*)
John W. Baumann (*pro hac vice*)
865 South Figueroa Street, 10th Floor
Los Angeles, CA 90017
(213) 443-3000
shonmorgan@quinnemanuel.com
jackbaumann@quinnemanuel.com

Daniel Lombard
191 N. Wacker Drive, Suite 2700
Chicago, IL 60606
(312) 705-7400
daniellombard@quinnemanuel.com

Cristina Henriquez (*pro hac vice*)
555 Twin Dolphin Drive, 5th Floor
Redwood Shores, CA 94065
(650) 801-5000
cristinahenriquez@quinnemanuel.com

*Attorneys for Defendants Ancestry.com
Operations Inc., Ancestry.com Inc., and
Ancestry.com LLC*

LAW OFFICE OF BENJAMIN R.
OSBORN

By: /s/ Benjamin R. Osborn
Benjamin R. Osborn

Dated: March 2, 2022

Shannon M. McNulty
CLIFFORD LAW OFFICES, P.C.
120 N. La Salle, Street, 31st Floor
Chicago, IL 60602
(312) 899-9090
SMM@cliffordlaw.com

Benjamin R. Osborn (*pro hac vice*)
LAW OFFICE OF BENJAMIN R.
OSBORN
102 Bergen St.
Brooklyn, NY 11201
(347) 645-0464
ben@benosbornlaw.com

Michael F. Ram (*pro hac vice*)
Marie N. Appel (*pro hac vice*)
MORGAN & MORGAN COMPLEX
LITIGATION GROUP
711 Van Ness Avenue, Suite 500
San Francisco, CA 94102
(425) 358-6913
mram@forthepeople.com
mappel@forthepeople.com

Attorneys for Plaintiff Sergio Bonilla

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on March 2, 2022, I caused a true and correct copy of the foregoing to be filed electronically with the Clerk of the Court using the CM/ECF system. Notice of this filing will be sent to counsel of record via the Court's CM/ECF automated filing system.

/s/ Shon Morgan

Shon Morgan